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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TANG KHEOK HWA ROSEMARY d/b/a	:	
R M MARTIN SUPPLIES AND SERVICES,	:	
	:	
Plaintiff,	:	07 CV 7498 (CM)
	:	
- against -	:	
	:	
	:	
JALDHI OVERSEAS PTE. LTD.,	:	
	:	
Defendants.	:	
	:	
-----X		

**NOTICE OF MOTION PURSUANT TO SUPPLEMENTAL RULE E(7) TO
REQUIRE THE PLAINTIFF TO POST COUNTER-SECURITY**

PLEASE TAKE NOTICE, that Defendant, JALDHI OVERSEAS PTE. LTD.,
(hereinafter "Jaldhi"), by and through its attorneys, CHALOS, O'CONNOR & DUFFY,
LLP, upon the annexed Memorandum of Law dated September 25, 2007, and the
Attorney's Affidavit of Owen F. Duffy in Support dated September 25, 2007, and the
pleadings and proceedings heretofore had herein, will move this Court before the
Honorable Colleen McMahon at the United States District Court, 500 Pearl Street, New
York, New York, at a time and date to be set by the Court upon the completion of the
submission of all papers in connection with this motion, for an Order requiring that

Plaintiff TANG KHEOK HWA ROSEMARY d/b/a R M MARTIN SUPPLIES AND SERVICES (hereinafter "RM Martin") post counter-security in this matter in the amount of \$3,687,207.80, and that, that if Plaintiff RM Martin fails to provide such security within ten (10) business days of the date of the Order, that the *Ex-Parte* Process of Maritime Attachment previously ordered in this case will be vacated, or, in the alternative, require that Plaintiff RM Martin post counter-security in the same amount of funds belonging to Defendant Jaldhi that it has restrained, and that if Plaintiff RM Martin fails to provide such security within ten (10) business days of the date of the Order, that the *Ex-Parte* Process of Maritime Attachment previously ordered in this case will be vacated or, in the alternative, that this Court grant such other and further relief as the Court may deem just and proper.

Dated: Port Washington, New York
September 25, 2007

CHALOS O'CONNOR & DUFFY
Attorneys for Defendant,
JALDHI OVERSEAS PTE. LTD.

By: 

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